By: Colin J. O'Brien, Esq.
(ID No. 263522018)
457 Haddonfield Road, Suite 100
Cherry Hill, NJ 08002-2223
T: (215) 564-8024
F: (215) 564-8120
cobrien@stradley.com
Counsel for Defendants Center for Family
Guidance and Marie Hasson, MD

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

The Estate of Edward C. Gandy, by and through its Administrator Ad Prosequendum, Shane S. Gandy and Shane S. Gandy, in his own right,

Plaintiff,

v.

City of Millville, Millville Police Department Police Chief Jody Farabella, in his individual capacity, Police Officer Colt Gibson, in his individual capacity, Cumberland County Guidance Center, Cumberland County Mental Health & Crisis Screening Facility, Dr. Victoria Eligulashvili, MD, Christal Hardin, RN, Marie Hasson, M.D., in her individual capacity, Center for Family Guidance, P.C., John and Jane Does Center for Family Guidance, P.C.1-10 (fictitious individuals), Inspira Inpatient Adult Behavioral Health, Bridgeton, Dr. Stephen Marc Scheinthal, DO, in his individual capacity, Dr. James J. Rogers, DO, in his individual capacity, John and Jane Doe Police Officers 1-10 (fictitious individuals) in their individual capacities, John Doe Corporations 1 through 10, and John Doe Entities 1 through 10, all whose true names are unknown,

Defendants.

Case No.: 1:20-CV-00641-CPO-AMD

ORDER GRANTING JOSEPH J. MCHALE, ESQ. ADMISSION PRO HAC VICE THIS MATTER having been brought before the Court by Colin J. O'Brien, Esq., of Stradley Ronon Stevens & Young, LLP, counsel for defendants Center for Family Guidance and Marie Hasson, MD, by motion for the entry of an Order admitting *pro hac vice* Joseph J. McHale, Esq., of Stradley Ronon Stevens & Young, LLP; and counsel for the defendants Center for Family Guidance and Marie Hasson, MD having advised the Court that no party will oppose the motion; and the Court having considered all papers filed in support of said application; and for good cause having been shown; IT IS on this ______ day of ______, 2022, ORDERED that Defendants' motion is GRANTED. It is further ORDERED that:

- 1. Joseph J. McHale is admitted *pro hac vice* pursuant to L. Civ. R. 101.1(c) for the sole purpose of entering an appearance on behalf of and representing Defendants Center for Family Guidance and Marie Hasson, MD.
- 2. Joseph J. McHale shall abide by all rules of this Court, including L. Civ. R. 103.1 and 104.1 governing professional responsibility and attorney discipline.
- 3. Joseph J. McHale, for the duration of time that he serves as counsel *pro hac vice* in this matter, shall make an annual payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) and shall pay the sum of \$150.00 to the Clerk of the United States District Court in accordance with L. Civ. R. 101.1(c)(3).
- 4. Joseph J. McHale shall notify the Court immediately of any disciplinary matter affecting his standing at the bar of any jurisdiction.

Honorable Ann Marie Donio, U.S.M.J.

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NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE* OF JOSEPH J. MCHALE, ESQUIRE

Motion Date: Motion will not be opposed

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned counsel for defendants Center for Family Guidance and Marie Hasson, MD, shall move before the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101, for the entry of an Order pursuant to Local Rule 101.1(c) admitting *pro hac vice* Joseph J. McHale to participate in the representation of the Defendants Center for Family Guidance and Marie Hasson, MD. In support, Defendants Center for Family Guidance and Marie Hasson, MD rely on the accompanying Declaration of Joseph J. McHale and the Declaration of Colin J. O'Brien. A proposed form of Order is also enclosed.

No brief is being filed. The motion will not be opposed.

Respectfully submitted,

Colin J. O'Brien, Esquire

STRADLEY RONON STEVENS & YOUNG, LLP

457 Haddonfield Road, Suite 100

(31. J. Didi

Cherry Hill, NJ 08002-2223

T: (215) 564-8024

F: (215) 564-8120 cobrien@stradley.com

Counsel for Defendants Center for Family

Guidance and Marie Hasson, MD

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DECLARATION OF JOSEPH J. MCHALE

- I, Joseph J. McHale, hereby certify and state:
- 1. I am an attorney-at-law admitted to the Bar for the Commonwealth of Pennsylvania (PA ID 65706) and the State of New York (NY ID 5395538) and am domiciled and principally practice law in Pennsylvania. I make this certification in support of my application for the admission as counsel *pro hac vice*.
- 2. Good cause exists to grant this Motion because Defendants Center for Family Guidance and Marie Hasson, MD, have requested that I appear and participate on their behalf in this matter.
- 3. I am a partner at Stradley Ronon Stevens & Young, LLP. I am a member in good standing of the Commonwealth of Pennsylvania and the State of New York. I was admitted in the Commonwealth of Pennsylvania in 1992, and the State of New York in 2016. The name and address of the official or office maintaining the roll of members of the Bar of the Commonwealth of Pennsylvania is the Supreme Court of Pennsylvania, Pennsylvania Judicial Center, 601 Commonwealth Ave., Suite 4500, P.O. Box 62575, Harrisburg, PA 17106. The name and address of the official or office maintaining the roll of members of the Bar of the State of New York is: NYS Unified Court System NYC Office, Office of Court Administration, 25 Beaver Street Rm. 852, New York, NY 10004.
- 4. I am not under any suspension or disbarment by the bar of any court. No disciplinary proceedings are pending against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction.
- 5. If admitted *pro hac vice*, I will be associated in this matter with Colin J. O'Brien, Esquire, (NJ ID 263522018) of Stradley Ronon Stevens & Young, LLP, a Pennsylvania Limited Liability Partnership (or another attorney in his firm who is a member in good standing of the bar

of the State of New Jersey and this Court). I understand that Mr. O'Brien is a member in good

standing of this Court, will act as counsel of record, will be responsible for receiving and signing

papers served in this case, and will be responsible for my conduct in this case.

6. If admitted pro hac vice, I will conduct myself in accordance with the rules

regulating and governing conduct of attorneys before this Court and will strictly observe the dates

fixed for scheduling conferences, motions, briefs, pre-trial conference, trial and any other

proceedings.

7. If admitted pro hac vice, I will make payment to the New Jersey Lawyers' Fund for

Client Protection in accordance with New Jersey Court Rule 1:28-2 and shall pay the sum of

\$150.00 to the Clerk of the United States District Court in accordance with Local Civil Rule

101.1(c)(3).

8. I certify that the foregoing statements made by me are true. I am aware that if any

of the foregoing statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

/s/ Joseph McHale

Joseph McHale

STRADLEY RONON STEVENS & YOUNG, LLP

A Pennsylvania Limited Liability Partnership

30 Valley Stream Parkway

Malvern, PA 19355-1481

P: 610.640.8007

F: 610.640.1965

Email: jmchale@stradley.com

By: Colin J. O'Brien, Esq.
(ID No. 263522018)
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Defendants.

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Filed Electronically

DECLARATION OF COLIN J. O'BRIEN

- I, Colin J. O'Brien, hereby certify and state:
- 1. I am an attorney with the law firm Stradley Ronon Stevens & Young, LLP, a Pennsylvania Limited Liability Partnership, attorneys Center for Family Guidance and Marie Hasson, MD. I am a member in good standing of the Bar of the State of New Jersey and this Court, as well as the Bar of the Commonwealth of Pennsylvania.
- 2. I submit this Declaration in support of the Center for Family Guidance and Marie Hasson, MD's application for the *pro hac vice* admission of Joseph J. McHale pursuant to L. Civ. R. 101.1(c).
- 3. As more fully detailed in the accompanying Declaration of Joseph J. McHale, Mr. McHale is a member in good standing of the Bar of the Commonwealth of Pennsylvania and the State of New York; he is not under any suspension or disbarment by the bar of any court; no disciplinary proceedings are pending against him in any jurisdiction; and no discipline has previously been imposed on him in any jurisdiction.
- 4. I, or another attorney with my firm who is a member in good standing of the Bar of New Jersey and this Court, will sign all pleadings, briefs and other papers filed with the Court on behalf of Center for Family Guidance and Marie Hasson, MD and will be present for all appearances before this Court unless previously excused.
- 5. In accordance with this application, I agree to comply with L.Civ.R. 101.1(c) and to be responsible for the conduct of Joseph J. McHale.
- 6. Counsel for Plaintiff and counsel for defendants have advised that they will not oppose this motion.
- 7. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

Colin J. O'Brien, Esquire

STRADLEY RONON STEVENS & YOUNG, LLP

457 Haddonfield Road, Suite 100

(St. J. Didi

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STATEMENT IN LIEU OF BRIEF PURSUANT TO LOCAL CIVIL RULE 7.1(d)(4) Pursuant to Local Civil Rule 7.1(d)(4), no brief in support of the motion for the admission *pro hac vice* of Joseph J. McHale is necessary because there are no legal issues to address, and the motion will not be opposed.

Respectfully submitted,

Colin J. O'Brien, Esquire

STRADLEY RONON STEVENS & YOUNG, LLP

457 Haddonfield Road, Suite 100

(st. g. Didi

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cobrien@stradley.com

Counsel for Defendants Center for Family

Guidance and Marie Hasson, MD

CERTIFICATE OF SERVICE

I, Colin J. O'Brien, Esq., hereby certify that on April 6, 2022, true and correct copies of the foregoing were filed via the Court's electronic filing system and thus served on all counsel of record.

/s/ Colin J. O'Brien

Colin J. O'Brien